

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

Docket No. 03-60

Respondent: Michael Nawrocki
Title: Principal MTS - Technology

REQUEST: AT&T Communications of New England, Inc., Set #2

DATED: December 22, 2003

ITEM: AT&T 2-61 On p. 16 of Verizon's Initial Panel Testimony, Verizon states that in certain COs, it utilizes devices that "automatically make copper-to-copper physical connections between any of a set of input positions and any of a set of output positions" on a distribution frame. With regard to this statement, please provide the following information:

- (a) All factors that Verizon considers in deciding where to deploy and not to deploy such devices,
- (b) The location and CLLI code of each CO where Verizon uses such devices,
- (c) The number of lines in service at each CO,
- (d) Whether the CO is manned or unmanned,
- (e) A description of the device or devices in use in each CO, including the manufacturer's name, and the device's make and model number,
- (f) The contracts or purchase orders through which each device was purchased, and
- (g) The average length of time it takes for the devices to perform a single hot cut connection and associated disconnect.

REPLY: (a) The factors that Verizon considers when deploying Auto MDFs include the size of the central office, whether the office is "staffed" or "unstaffed", and the geographic location of the office with respect to other existing or planned Auto MDF offices. Verizon has typically deployed Auto MDFs in small "unstaffed" offices with less than 4000 lines, and where an opportunity exists to cluster with other Auto MDF offices. Central office surveys are then required to verify that other factors such as floor space and power would exist to accommodate a

new Auto MDF cabinet.

- (b) Auto MDFs are deployed in the following locations:

| <u>Central Office</u> | <u>CLLI</u> |
|-----------------------|-------------|
| Northfield | NRFDMAMA |
| Montague | TAGMACE |
| Bernardston | BRNRMACH |
| Millers Fall | MLFLMACR |
| Charlemont | CHMTMASO |
| Colrain | CLRNMAYA |
| Granville | GRVIMAWG |
| Chester | CHESMAMU |
| Ashby | ASHBMASO |
| Hubbardston | HBTNMAMA |
| Bolton | BOTHMAMA |
| Berlin | BRLNMAHI |

- (c) Please see attached worksheet that shows the quantity of switched access lines (retail, resale and UNE-P) on a voice grade equivalent basis, as of June 30, 2003. The attachment contains information that is proprietary, confidential and competitively sensitive, and is being provided in accordance with the terms of the Department's Protective Order.
- (d) These offices are unmanned.
- (e) The device deployed in the CO is NHC ControlPoint™ 5400.
- (f) Contract BA20083 contains the details of Verizon's agreement with NHC.
- (g) Auto MDFs deployed in Massachusetts are not currently used to perform hot cut connections, since deployment is generally limited to small unstaffed central offices and deployment to date has been in offices with no collocation. For general applications, it typically takes less than two (2) minutes to complete an Auto MDF connection (or associated disconnect) once the order is forwarded to the Auto MDF from the NHC ControlPoint Connection Management System.

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Docket No. 03-60

Respondent: Jim McLaughlin
Title: Executive Director

REQUEST: AT&T Communications of New England, Inc., Set #2

DATED: December 22, 2003

ITEM: AT&T 2-66 P. 30 of Verizon's Initial Panel Testimony states that "the Manager's Area policy itself will obviously be reviewed and modified as appropriate in the context of the larger hot cut volumes that might result from a non-impairment finding by the Commission and the resulting elimination of UNE-P."

- (a) Please confirm that there is nothing in Verizon's testimony that indicates what this revised policy would entail and what Verizon's large job capabilities will be in this environment.
- (b) Please provide details of what Verizon's maximum throughput will be in such an environment.
- (c) Please provide all limitations on redeploying craft labor from central office to central office across the state as volumes surge or contract in a particular area. For example, what are the constraints on redeploying craft from one managers area to another or from one geographic area to another, such as minimum advanced notice, minimum deployment tours, premium compensation required.

REPLY:

- (a) Verizon MA's testimony speaks for itself.
- (b) Verizon MA objects to this Information Request on the grounds that the request seeks information that is beyond the scope of the analysis at issue in the Department's review of Verizon MA's case and will

not lead to the discovery of admissible evidence. Information regarding Verizon's "maximum" throughput is not relevant to any issue in this proceeding. Additionally, "maximum throughput" depends upon such factors as the staffing levels that Verizon chooses to maintain. Verizon MA further objects to this request to the extent that it would require a burdensome special study to provide a quantitative answer. Without waiving its objections, Verizon MA responds as follows. Please see Verizon MA's testimony and exhibits that relate to its scalability study, which demonstrate that Verizon MA will be able to handle the hot cut volumes that would be expected in a post UNE-P environment.

- (c) Transfers or redeployment of Central Office Technicians (COTs) are covered by the Plant Collective Bargaining Agreement (CBA). Relevant portions of Article P14 dealing with transfers is reproduced below.

Article P14: Transfers.

GENERAL

P14.01 Procedures for the permanent or temporary transfer of employees shall be as outlined in this Article.

P14.02 For the purpose of this Article a reporting headquarters is the specific bid or assigned location to which an employee normally reports to work.

P14.03 For the purpose of this Article a transfer occurs when:

- (a) An employee's reporting headquarters, as defined in paragraph P14.02, is changed, or
- (b) An employee's job title is changed at the same or a different reporting headquarters.

P14.04 Employees will normally be assigned to their job title at their reporting headquarters. However, because of the requirements of the service or for other reasons it may be necessary to transfer employees, either permanently or temporarily.

TEMPORARY TRANSFERS

P14.08 Transfers are considered temporary regardless of the period involved when the employee transferred is to be

returned to his or her original assignment or reporting headquarters at the end of the transfer period.

P14.09 Temporary transfers of employees outside of their job titles will be for one week or more, except as provided for in paragraph P14.10; however, the nature of our service is such that storms, fires, floods and other hazards, as well as unusual demands for service may necessitate the temporary transfer of employees to another job title for less than one week to meet these exigencies as they occur.

P14.10 Available senior qualified employees may be temporarily transferred outside of their job title for less than one week provided that, where an unassigned day in the work group to which the employee is transferred is involved, the unassigned employee shall first be canvassed for the assignment. Regardless of the period involved, the Company will conduct a similar canvass when an employee is temporarily: transferred within the job title; or assigned to a work group which performs a different work function (e.g. construction to maintenance, special services testing to special services switch analysis, etc.).

P14.11 Temporary transfers shall not be made for periods exceeding one month except under unusual conditions at which time the appropriate Business Manager will be notified. The available senior qualified employee shall have preference. If no volunteers, the junior qualified employee shall be assigned. When determining the available senior qualified employee a reasonable effort will be made to canvass all employees in the work group involved at the location or locations to be canvassed. This paragraph is not applicable to the E.I. Department.

P14.12 An employee who is to be temporarily transferred to a distant point will, whenever practicable, be notified by at least the Wednesday prior to the week in which the transfer is effective.

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

Docket No. 03-60

Respondent: Kevin Van Inwegen
Julie Canny

Title: Manager – Wholesale
Executive Director – Wholesale

REQUEST: AT&T Communications of New England, Inc., Set #2

DATED: December 22, 2003

ITEM: AT&T 2-70 With regard to the new batch hot cut process, please explain the following.

- (a) What are the hours of availability for the batch hot cut process (e.g., available on a 24/7 basis)?
- (b) If the batch hot cut process is available outside of regular business hours, will the batch hot cuts be charged at normal costs or will an expedited fee be applied?
- (c) Will there be a limitation on the volumes of out-of-hours batch hot cuts?
- (d) Will all central offices be available for batch hot cuts outside of regular business hours?
- (e) What will be the process for populating the E911 database after a batch hot cut?
- (f) What metrics does Verizon propose for measuring the performance of batch hot cuts?
- (g) Does Verizon's proposed batch hot cut rate include the costs from NPAC for number porting? If not, how does Verizon believe that these costs should be handled?
- (h) If Verizon assumes a CLEC's responsibility to notify NPAC for number porting after a batch hot cut, how and when would notification of NPAC occur? Will the

frame technician (or some other Verizon work group) activate the number port immediately after each line is cut over, or will there be a waiting period?

- (i) Do the manager and geographic area restrictions that exist for the current large job hot cut process apply to Verizon's proposed batch hot cut process? Additionally, if there are any geographic restrictions on the number of simultaneous batch hot cut jobs that can occur on a given day please explain these restrictions.
- (j) Where is Verizon conducting its trial of this process? (see p. 36 of Verizon's Initial Panel Testimony).
- (k) What CLEC(s) is participating in this trial?
- (l) Please provide specifics on how Verizon is conducting this trial.

REPLY:

- (a) Since no direct coordination with the CLEC is required under the Batch Hot Cut process, Verizon will be able to cut over lines on a 24 X 7 basis, subject to the availability of frame technicians. In practice, a CLEC will be notified of the date on which a Batch Hot Cut is scheduled to be completed. No designated cut over time (similar to the FDT on a regular Hot Cut) will be provided, however. Rather, the precise scheduling of the hot cut will be within Verizon's discretion. The CLEC will be notified through WPTS once the end user is migrated and the service has been ported onto the CLEC switch.
- (b) No expedite fee will be applied for Batch Hot Cuts merely because Verizon decides to perform the cutover outside of normal business hours.
- (c) There will be no pre-set limits on the number of cutovers that will be performed after hours. However, refer to Verizon's response to (a) above for clarification.
- (d) There will be no pre-set restrictions on the offices in which batch hot cuts will be performed outside of regular business hours. However, refer to Verizon's

response (a) above for clarification.

- (e) This will be handled consistent with the practices currently utilized by Verizon for customers migrated through the Basic Hot Cut process.
- (f) Currently no metrics exist for the proposed batch hot cut process. Verizon MA expects the development of metrics to address the new process after it is implemented and worked through the Carrier Working Group collaborative in New York. Once adopted in New York, Verizon MA will follow existing procedures to propose the same modifications in Massachusetts.
- (g) Verizon MA's proposed batch hot cut rate does not include any allowance for recovery of charges imposed by NPAC in connection with number porting. Verizon MA does not propose any changes in the application of NPAC's rates in connection with the batch process. Any charges that NPAC would normally impose on a CLEC in connection with a hot-cut-related number port would still be imposed on that CLEC by NPAC in connection with the batch process. Verizon would not be involved in the assessment or collection of any such charges. Verizon MA is proposing to submit the final port authorization to NPAC in connection with the batch hot cut process because the proposal would reduce the need for coordination between Verizon MA and the CLEC, allow greater flexibility in determining cutover times, and result in greater convenience (and lower cost) to the CLEC. However, the proposal does not aim to shift NPAC charges in any way or to free the CLEC from the necessity of paying those charges.
- (h) Notification would be handled automatically by WPTS once the completion notice is entered into that system. In general, WPTS will be updated immediately after a group of individual lines (typically ten or the lines within a single order) is cut over.
- (i) No, they do not apply to the proposed batch hot cut process.

AT&T 2-70
REPLY (cont'd)

- (j) Verizon plans to conduct a trial in New York State.
- (k) A complete list of trial participants has not been developed.
- (l) CLECs involved in the trial will be asked to submit LSRs that can be used to ensure all aspects of the process work together to ensure that end users are migrated with a minimal disruption of service.

VZ # 184